

UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF MASSACHUSETTS

CRIMINAL No. 04-10384-PBS

UNITED STATES

v.

DANIEL KAMEN

**DEFENDANT'S MOTION TO MODIFY CONDITIONS OF RELEASE –
ASSENTED TO**

Daniel Kamen, defendant in the above-captioned criminal case, hereby moves this Honorable Court to modify his conditions of release so that he may leave the house between the hours of 12 noon and 8 p.m. without being in the company of a member of the family. The defendant also seeks permission to travel with his mother from Boston to California and Washington State in late June and early July. In support of this motion, the defendant states:

1. Since December 2006, the defendant has been permitted to leave his house for up to four hours at a time if he is in the presence of a family member. His treating mental health professional, Dr. Carol Ball, believes that the defendant's mental condition would be aided if he were permitted to have some greater freedom. In Dr. Ball's opinion, permitting the defendant to be outside the house from 12 noon until 8 p.m. would be helpful.
2. The defendant's sister, Deborah Kamen (who attended the trial), is moving from California to Washington State in late June. Mrs. Kamen would like to assist her in the

move. The defendant proposes that he be permitted to travel with his mother via plane from Boston to California on June 29, drive to Seattle on June 30 or July 1, and return to Boston on July 7. The defendant would be in the presence of his mother or sister during the trip.

3. Assistant U.S. Attorney Paul Moore assents to this motion.

Respectfully submitted,
DANIEL KAMEN
By his attorneys,

/s/ Charles W. Rankin
Charles W. Rankin, BBO 411780
Michelle Menken
Rankin & Sultan
151 Merrimac Street
Boston, MA 02114
(617) 720-0011

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) on June 5, 2007.

/s/ Charles W. Rankin
Charles W. Rankin